

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NATIONAL URBAN LEAGUE, on behalf of
itself and its members; COMMON CAUSE,
on behalf of itself and its members; LEAGUE
OF WOMEN VOTERS OF THE UNITED
STATES, on behalf of itself and its members,

Plaintiffs,

vs.

LOUIS DEJOY, in his official capacity as
Postmaster General; and the UNITED
STATES POSTAL SERVICE,

Defendants.

No. 1:20-cv-2391

EXPEDITED HEARING REQUESTED

MOTION FOR LEAVE TO CONDUCT LIMITED EXPEDITED DISCOVERY

Pursuant to Rules 26, 30, and 34 of the Federal Rules of Civil Procedure, Plaintiffs National Urban League, Common Cause, and League of Women Voters of the United States (“Plaintiffs”) respectfully move for expedited discovery (prior to the time established by Rule 26(d)) to obtain evidence concerning the Postal Service’s implementation of recent changes to the nature of postal services. *See* Exhibits A & B (the Plaintiffs’ proposed discovery requests). Counsel for Plaintiffs conferred with counsel for Defendants and Defendants intend to oppose this motion.

Conscious of the time constraints and the inherent burdens of discovery, Plaintiffs have carefully tailored and limited their initial discovery request to a single deposition pursuant to FRCP 30(b)(6) limited to a circumscribed list of topics closely related to the claims in this lawsuit and a small number of closely related requests for production. Expedited discovery will help determine whether preliminary relief is warranted, particularly because recent changes at the Postal Service

are not reflected in any formal agency policy or published rulemaking but instead have occurred behind the scenes without prior public notice or notice to the Postal Regulatory Commission. And, because the November 3 general election is only about 9 weeks away, if any relief is to be effective, it must be obtained quickly.

Plaintiffs propose that their discovery requests be deemed served on the date the Court issues an order granting this motion in whole or in part; that Defendants provide any objections to Plaintiffs' discovery requests within three (3) days, and that the deposition be scheduled for a mutually convenient time on or before September 8, 2020. Plaintiffs propose that Defendants provide documents responsive to Plaintiffs' requests for production of documents two business days before the deposition.

A proposed order accompanies this motion.

Dated: August 26, 2020

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* *Pro hac vice*

** *Pro hac vice* application forthcoming

CERTIFICATE OF SERVICE

I hereby certify that this document will be served on Defendants in accordance with Fed.

R. Civ. P. 4.

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